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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**KIMBERLEE WILLIAMS, et al.**

Plaintiffs,  
vs.  
**BASF CATALYSTS LLC, et al.**

Defendants.

No. 2:11-cv-01754 (JLL) (JAD)

CIVIL ACTION

**CERTIFICATION OF  
COUNSEL**

CHRISTOPHER M. PLACITELLA, of full age, hereby certifies as follows:

1. I am an attorney at law in the State of New Jersey and a shareholder with the law firm of Cohen, Placitella and Roth, P.C.

2. I am familiar with the facts and circumstances of the within action.
3. Attached as Exhibit 1 is a true and correct copy of the June 7, 2018 Interim Order from Special Master Re ECF No. 531.
4. Attached as Exhibit 2 is a true and correct copy of the June 18, 2018 Order from Special Master Re ECF No. 581.
5. Attached as Exhibit 3 is a true and correct copy of the May 12, 2018 Order from Special Master Re ECF No. 493.
6. Attached as Exhibit 4 is a true and correct copy of the June 12, 2018 Order from The Honorable Jose L. Linares Re ECF No. 571.
7. Attached as Exhibit 5 is a true and correct copy of ECF filing 531 BASF letter to Special Master dated May 21, 2018.
8. Attached as Exhibit 6 is a true and correct copy of ECF filing 540 Plaintiffs' letter to Special Master dated June 1, 2018.
9. Attached as Exhibit 7 is a true and correct copy of ECF filing 545, a letter from counsel for Thomas Bevan, Esquire dated June 1, 2018.
10. Attached as Exhibit 8 is a true and correct copy of ECF filing 552, BASF letter to Special Master dated June 6, 2018.
11. Attached as Exhibit 9 is a true and correct copy of ECF filing 493-2, Subpoena to Produce Documents directed to Bevan & Associates dated November 21, 2016.

12. Attached as Exhibit 10 is a true and correct copy of the October 26, 2017 Transcript of Proceedings before Special Master Roberto A. Rivera-Soto.

13. Attached as Exhibit 11 is a true and correct copy of Plaintiffs' Objections to Defendant BASF Catalysts LLC's Subpoena Served Upon Thomas Bevan and Bevan Associates LPA, Inc.

14. Attached as Exhibit 12 is a true and correct copy of BASF letter to The Honorable Joseph A. Dickson dated February 16, 2017 ECF 242.

15. Attached as Exhibit 13 is a true and correct copy of BASF letter to Special Master dated April 27, 2018 ECF 493.

16. Attached as Exhibit 14 is a true and correct copy of BASF letter to Christopher M. Placitella, Esquire dated June 13, 2018.

17. Attached as Exhibit 15 is a true and correct copy of Plaintiffs' letter to The Honorable Jose L. Linares dated June 14, 2018 ECF 577.

18. Attached as Exhibit 16 is a true and correct copy of Special Master Roberto A. Rivera-Soto letter to Christopher M. Placitella dated June 15, 2018.

19. Attached as Exhibit 17 is a true and correct copy of Plaintiffs' letter to Special Master dated June 18, 2018 ECF 581.

20. Attached as Exhibit 18 is a true and correct copy of Order from Special Master ECF 581 dated June 18, 2018.

21. Attached as Exhibit 19 is a true and correct copy of Thomas Bevan, Esquire's deposition transcript dated May 15, 2018.

22. Attached as Exhibit 20 is a true and correct copy of a letter from Christopher M. Placitella to Plaintiff Kimberlee Williams dated March 15, 2011.

23. Attached as Exhibit 21 is a true and correct copy of Plaintiff Donnette Wengerd's deposition transcript dated April 6, 2017.

24. Attached as Exhibit 22 is a true and correct copy of Plaintiff Donnette Wengerd's deposition transcript dated March 12, 2018.

25. Attached as Exhibit 23 is a true and correct copy of the June 18, 2018 email from the Special Discovery Master.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements by me are willfully false, I am subject to punishment.

COHEN, PLACITELLA & ROTH, P.C.  
/s/ Christopher M. Placitella  
CHRISTOPHER M. PLACITELLA

Dated: June 20, 2018